

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

**FILED**

OCT 17 2017

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY Natasha K. [Signature], DEPUTY

UNITED STATES OF AMERICA, )

Plaintiff, )

-vs- )

JERRY DRAKE VARNELL, )

Defendant. )

No.

CR 17-239 M

Violation: 18 U.S.C. § 844(i)

**INDICTMENT**

The Federal Grand Jury charges:

**COUNT 1**

**(Attempted Use of an Explosive Device)**

On or about August 11, 2017 to August 12, 2017, in the Western District of Oklahoma, the defendant,

----- JERRY DRAKE VARNELL, -----

maliciously attempted to damage and destroy, by means of fire and an explosive, a building and real property used in interstate and foreign commerce and in an activity affecting interstate and foreign commerce. In particular, the defendant attempted to use explosives to damage and destroy the BancFirst building at 101 N. Broadway, Oklahoma City, Oklahoma.

All in violation of Title 18, United States Code, Section 844(i).

A TRUE BILL:

A handwritten signature in black ink, appearing to read "J. Bryan Blackwell".

FOREPERSON OF THE GRAND JURY

MARK A. YANCEY  
United States Attorney

A handwritten signature in blue ink, appearing to read "Matt Dillon".

MATT DILLON  
MARK R. STONEMAN  
Assistant U.S. Attorneys